

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DR. JUDY WOOD on behalf of the
UNITED STATES OF AMERICA,

Plaintiff / Realtor,

vs.

APPLIED RESEARCH ASSOCIATES, INC.;
SCIENCE APPLICATIONS INTERNATIONAL
CORP.; BOEING; NuSTATS; COMPUTER
AIDED ENGINEERING ASSOCIATES, INC.;
DATASOURCE, INC.; GEOSTAATS, INC.;
GILSANZ MURRAY STEFICEK LLP;
HUGHES ASSOCIATES, INC.; AJMAL
ABBASI, EDUARDO KAUSEL;
DAVID PARKS; DAVID SHARP; DANIELE
VENEZANO; JOSEF VAN DYCK, KASPAR
WILLIAM; ROLF JENSEN & ASSOCIATES,
INC.; ROSENWASSER/GROSSMAN CONSULTING
ENGINEERS, P.C.; SIMPSON GUMPERTZ &
HEGER, INC.; S.K. GHOSH ASSOCIATES,
INC.; SKIDMORE, OWINGS & MERRILL,
LLP; TENG & ASSOCIATES, INC.;
UNDERWRITERS LABORATORIES, INC.;
WISS, JANNEY, ELSTNER ASSOCIATES,
INC.; AMERICAN AIRLINES; SILVERSTEIN
PROPERTIES; and UNITED AIRLINES,

Defendants.
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Civil Action
No. 07 CV 3314 (GBD)

ECF CASE

**DECLARATION OF CHAD
E. SJOQUIST IN SUPPORT
OF MOTION FOR RULE 11
SANCTIONS**

Chad E. Sjoquist, an attorney admitted to practice in the State of New York and
before this Court, declares the following pursuant to 28 U.S.C. § 1746:

1. I am an associate of the law firm of Zetlin & De Chiara, LLP, attorneys
for Defendant Skidmore, Owings & Merrill LLP ("SOM"). I am fully familiar with the facts
stated herein.

2. I respectfully submit this Declaration in support of SOM's motion, pursuant to Rule 11 of the Federal Rules of Civil Procedure, which seeks an order imposing sanctions against Plaintiff/Relator Judy Wood and Plaintiff/Relator's counsel, Jerry V. Leaphart and the Law Offices of Jerry V. Leaphart & Associates, P.C.

3. On or about December 28, 2007, Plaintiff/Relator filed a First Amended Qui Tam Complaint and Jury Demand against SOM ("the Complaint") that alleges violations of the False Claims Act.

4. On or about January 28, 2008, SOM filed a motion seeking dismissal of the Complaint and identifying the legal inadequacy of Plaintiff/Relator's First Amended Complaint and inapplicability of the False Claims Act – a fact of which Plaintiff/Relator's counsel is well aware since Plaintiff/Relator Wood's Complaint is defective for substantially the same reasons that the complaint in Morgan Reynolds v. Science Applications International Corp. (07 CV 4612 (GBD)) is inadequate, as set forth in SOM's 12(b) motion in that action.

5. On or about January 23, 2008, Co-Defendant Applied Research Associates, Inc. ("ARA") served upon Plaintiff/Relator a proposed motion for Rule 11 Sanctions. Upon information and belief, Plaintiff/Relator did not withdraw any of her claims against ARA.

6. On February 14, 2008, ARA filed with the Court via ECF a final motion seeking Rule 11 sanctions against Plaintiff/Relator and her counsel, Jerry V. Leaphart, Esq. SOM hereby incorporates by reference, relies upon, and joins ARA's motion and accompanying Memorandum of Law.

7. Specifically, SOM relies upon the fact that the Complaint is clearly frivolous because Plaintiff/Relator has not even remotely met the heightened pleading requirements for claims of fraud as codified in Fed. R. Civ. P. 9(b). Plaintiff/Relator's claims

under the False Claims Act are also barred as a matter of law because Plaintiff relies entirely on information that is in the public domain, and Plaintiff has not, and cannot, demonstrate that she is the original source of that information.

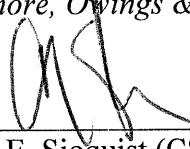
8. Because Plaintiff/Relator's Claims are both factually and legally groundless and entirely frivolous, SOM respectfully requests that this Court issue an Order, pursuant to Fed. R. Civ. P. 11, imposing sanctions on Plaintiff/Relator and her counsel.

9 I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: New York, New York
February 15, 2008

Respectfully submitted,

ZETLIN & DE CHIARA, LLP
Attorneys for Defendant
Skidmore, Owings & Merrill LLP



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